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December 8, 2005

VIA ELECTRONIC FILING

Kevin Martin, Chairman
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Ex Parte* Letter from Lisa Polak Edgar, Commissioner, Florida Public Service Commission, to Kevin Martin, Chairman, Federal Communications Commission, filed in CC Docket No. 96-45 and WC Docket No. 03-109

Dear Chairman Martin:

CenturyTel, Inc. (together with its subsidiaries, "CenturyTel"), supports the Florida Public Service Commission's request filed on November 30, 2005 in the above-captioned proceedings.¹ CenturyTel believes that the Commission should adopt language requiring all Eligible Telecommunications Carriers ("ETCs") to follow both federal and state Lifeline and Link-Up policies in each state in which these carriers have ETC status, as a condition of ETC designation and annual certification.

Incumbent local exchange carriers ("ILECs") currently must satisfy all federal and state universal service obligations in each state in which they have ETC status, including obligations relating to the offering of Lifeline and Link-Up services. Lifeline and Link-Up service requirements vary significantly by state, and between states and the FCC, and such variance imposes not insignificant financial and other burdens on carriers subject to these requirements. In particular, federal rules obligate incumbent ETCs to publicize the availability of Lifeline and Link-Up services in each state in which they have ETC status.² Competitive ETCs are not routinely required to meet such obligations.

¹ Letter from Lisa Polak Edgar, Commissioner, Florida Public Service Commission and Member, Federal-State Joint Board on Universal Service, to Kevin Martin, Chairman, FCC, filed in CC Docket No. 96-45 and WC Docket No. 03-109 (dated Nov. 30, 2005).

² 47 C.F.R. §§ 54.405(b), 54.411(d).

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Disparate treatment of incumbent and competitive ETCs not only is difficult to justify, but also is a growing problem. Indeed, this problem is one of the primary drivers of the growing push for deregulatory policy in the states and at the federal level. In the past five years, competitive ETC designations have proliferated and CETC funding levels have grown exponentially. For example, competitive ETCs receiving high-cost support grew from just 2 in the year 2000 to 249 in 2005.³ During the same time frame, universal service support to competitive ETCs grew from approximately \$1.5 million to an amount projected to exceed \$800 million.⁴ The states and the FCC have imposed fewer requirements on competitive ETCs than on ILECs.⁵ Such policies put incumbent ETCs at a competitive disadvantage.

Competitive ETCs should be subject to the same ETC requirements as incumbent ETCs, whether imposed by states or by the FCC.⁶ Only then can the true benefits of competition be fully realized. For the foregoing reasons, CenturyTel supports requiring all ETCs to follow federal and state Lifeline and Link-Up policies in all jurisdictions where such carriers have ETC status.

Very truly yours,

CENTURYTEL, INC.

/s/

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³ Number of CETCs Receiving Support, 1998 Through 3Q2005, available at http://www.universalservice.org/hc/overview/qtr_graphs.asp.

⁴ USAC Quarterly Administrative Filing 2005, Fourth Quarter, Appendix HC01 at www.universalservice.org/overview/filings (based on fourth quarter figures, CETCs will receive \$816.2 million in high-cost support in 2005 on an annualized basis).

⁵ See Comments of CenturyTel, CC Docket No. 96-45, 7-11 (filed Aug. 6, 2004).

⁶ See *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371 (2005) (adopting uniform federal guidelines for designation and annual certification of ETCs).